

Exhibit 11

KIRKLAND & ELLIS LLP

AND AFFILIATED PARTNERSHIPS

Catie Ventura
To Call Writer Directly:
+1 202 879 5907
catie.ventura@kirkland.com

1301 Pennsylvania Ave, N.W.
Washington, D.C. 20004
United States

+1 202 879 5000

www.kirkland.com

Facsimile:
+1 202 879 5200

June 13, 2019

By E-mail

Patrick L. Oot
1155 F Street, N.W., Suite 200
Washington, DC 20004
oot@shb.com

Re: *In re: National Prescription Opiate Litigation*, MDL No. 2804

Dear Patrick:

I write to follow up again on our correspondence requesting suspicious order monitoring-related deliverables between BuzzeoPDMA (and related entities) and Actavis Pharma, Inc. or Watson Pharma, Inc.

On February 5, 2019, we requested your help finding certain documents, including the deliverable (if any was actually created) referenced in the August 3, 2011 Statement of Work #1 between Watson Pharma, Inc. and BuzzeoPDMA. That Statement of Work indicates that BuzzeoPDMA would “provide Customer an onsite review and assessment of its current SOM system” and “[t]he deliverable for this onsite review will be a report that identifies any gaps or other recommended changes to assist Customer in enhancing their SOM system...” We requested copies of any such audits, assessments, or other work product for any of the Watson or Actavis companies.

On February 15, 2019, you responded and indicated that “By February 22, 2019, barring any unforeseen circumstances, IQVIA will provide Clients with the final set of readily-accessible deliverables with Buzzeo-related entities via a secure download link and password.”

Having received no deliverables, we wrote to you on May 29, 2019 to confirm that you do not have the report referenced in Statement of Work #1 described above, or any related documents to provide. We still have not received a response.

Plaintiffs have asked us to confirm by June 14, 2019 whether we have this report, so we ask you to please confirm whether or not you have a copy of it (or related documents) as soon as possible.

